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April 27, 2016

**BY ECF**

Honorable Robert W. Sweet  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Schoolcraft v. Jamaica Hospital Medical Center, et al.*  
10-CV-6005 (RWS)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing the City of New York (the "City") in connection with the above-captioned matter. The City writes in response to Plaintiff's letter dated April 11, 2016 (filed *via* ECF on April 27, 2016) concerning the scope and size of the Reply Memorandum of Law in Support of Plaintiff's Motion for Attorneys' Fees. The City respectfully requests an order (i) limiting Plaintiff's submissions to one Memorandum of Law; and (ii) setting a page limit to Plaintiff's reply submission.

Plaintiff's request refers to plaintiff making multiple Reply submissions. The City respectfully requests that plaintiff should be allowed only one submission. As the Court has already ruled, the attorney-fee claim belongs to the plaintiff and counsel are not parties to this proceeding, so there is no warrant for multiple submissions.

The City also respectfully requests that the Court set some limit on the size of the Reply. A Reply memorandum half of the length of the opposition memorandum would be typical, but we leave the precise number to the Court's discretion.

In addition, the City should be permitted a reasonable time to review the Plaintiff's submission and prepare an oral response or request a written sur-reply before the oral argument date set by the Court. Accordingly, depending on the size of the submission, the City may be required to ask for an adjournment of the oral argument date in order to avoid prejudice from the oversize submission.

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We thank the Court for its consideration of the matter.

Respectfully submitted,

/s/Cheryl Shammas

Cheryl Shammas

*Senior Counsel*

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cc: All counsel by ECF